

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

)	PROMESA
In re)	Title III
)	
THE FINANCIAL OVERSIGHT AND)	No. 17 BK 3283-LTS
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	(Jointly Administered)
)	
As a representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO)	
<i>et al.</i> ,)	
)	
Debtors. ¹)	
)	

SECOND INTERIM AND CONSOLIDATED APPLICATION OF EDGE LEGAL STRATEGIES, P.S.C., LOCAL COUNSEL TO THE FEE EXAMINER, BRADY WILLIAMSON, ESQ., FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM FEBRUARY 2020 TO AUGUST 2020

SUMMARY

Name of applicant:	EDGE Legal Strategies, P.S.C.
Authorized to provide professional services to:	Brady Williamson, Esq., Fee Examiner
Date of Fee Examiner's Appointment:	October 6, 2017
Date of Order approving employment of EDGE LEGAL STRATEGIES, P.S.C.	December 13, 2017

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and, (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 2

Period for which compensation and reimbursement is sought:	February 2020 To August 2020 (the "Compensation Period"):
Amount of compensation sought as actual, reasonable, and necessary:	\$6,900.00
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$76.10
Blended rate in this application for all attorneys:	\$194.81
Blended rate in this application for all timekeepers:	\$194.81
Prior Interim or Monthly Fee Payments to date:	None.
Prior total allowed compensation paid to date:	None.
Prior expenses approved by Interim Order to date:	None.
Prior total allowed expenses paid to date:	None.
Number of professionals included in this application:	2
If applicable, number of professionals in this application not included in staffing plan approved by client:	Not applicable
If applicable, difference between fees budgeted and compensation sought for this period:	Not applicable
Are any rates higher than those approved or disclosed at retention?	No

This is a(n): ☐ monthly ☒ interim ☐ final application

ATTACHMENTS TO FEE APPLICATION

EXHIBIT A – LIST OF PROFESSIONALS

Attached to this Application as **Exhibit A**, in compliance with the U.S. Trustees Guidelines is a chart identifying each of the EDGE LEGAL STRATEGIES, P.S.C. professionals employed

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 3

on the case, their practice areas and years of experience, their hourly billing rate, total billed hours, total compensations sought, and number of rate increases imposed during the Compensation Period (none).

EXHIBIT B: COMPENSATION BY PROJECT CATEGORY

Attached to his Application as **Exhibit B**, in compliance with the U.S. Trustees Guidelines, is a summary of compensation requested by project category.

EXHIBIT C: EXPENSE SUMMARY

Attached to this Application as **Exhibit C**, in compliance with the U.S. Trustees Guidelines, is a summary, by category, of requested expense reimbursements.

EXHIBIT D: LIST OF PROFESSIONALS BY MATTER

Attached to this Application as **Exhibit D**, in compliance with the U.S. Trustee Guidelines, is a chart identifying each of EDGE LEGAL STRATEGIES, P.S.C. professional who provided services during the Compensation Period, organized by project category.

EXHIBIT E: DETAILED TIME RECORDS-EDGE LEGAL STRATEGIES, P.S.C.

Attached to this Application, as **Exhibit E**, in compliance with the U.S. Trustee Guidelines, are detailed records of the services provided by EDGE LEGAL STRATEGIES, P.S.C., during the Compensation Period, organized by project category.

EXHIBIT F: DETAILED EXPENSE RECORDS- EDGE LEGAL STRATEGIES, P.S.C.

Attached to this Application, as **Exhibit F**, are the expense records detailing the expenses for which EDGE LEGAL STRATEGIES, P.S.C. requests reimbursement.

EXHIBIT G: “CUSTOMARY AND COMPARABLE” DISCLOSURES

The “Customary and Comparable Compensation Disclosures with Fee Applications,” as required by the U.S. Trustee Guidelines, are attached to this Application as **Exhibit G**.

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 4

EXHIBIT H: BUDGET & STAFFING PLAN

The budget and staffing plans, as required by the U.S. Trustee Guidelines, are attached to this Application as **Exhibit H**.

EXHIBIT I: PROPOSED ORDER

A Proposed Order Allowing Second Interim and Consolidated Application of EDGE LEGAL STRATEGIES, P.S.C. is attached to this Application as **Exhibit I**.

FEE APPLICATION

EDGE LEGAL STRATEGIES, P.S.C. (“**ELS**”), local counsel to Brady Williamson, Esq., Fee Examiner, in accordance to the *Order Authorizing the Employment of EDGE LEGAL STRATEGIES, P.S.C. As Local Counsel To The Fee Examiner* (Docket No. 1992), submits this *Second Interim And Consolidated Application Of EDGE LEGAL STRATEGIES, P.S.C., Local Counsel To The Fee Examiner, Brady Williamson, Esq., For Allowance Of Compensation For Services Rendered And Reimbursement Of Expenses For The Period From February 2020 To August 2020* (the “**Fee Application**”) under the Puerto Rico Oversight, Management and Economic Stability Act (PROMESA) §§ 316 and 317, 11 U.S.C. §§ 330 and 331, Rule 2016 of the Federal Rules of Bankruptcy Procedures, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico, and the U.S. Trustee Guidelines. Pursuant to the *Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy code Section 105(A) Appointing Fee Examiner and Related Relief* (Docket No. 1416) and the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing Fee Examiner and Related Relief* (Docket No. 3324) (together, the “**Fee Examiner Order**”), the Fee Application requests interim allowance of compensation for the past months of

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 5

professional services and reimbursement of actual and necessary expenses incurred from February 1, 2020 through August 31, 2020 (the “**Compensation Period**”).

The Applicant requests Court approval of a total of \$6,900.00 in fees and \$76.10 in expenses. This total would, if expressed in terms of an hourly rate, reflect a blended hourly rate of \$181.74 for attorneys. The *Order Authorizing the Employment of EDGE LEGAL STRATEGIES, P.S.C. As Local Counsel to The Fee Examiner* (Docket No. 1992) (the “**EDGE Retention Order**”), incorporating the engagement letter attached as Appendix C to the Affidavit of Eyck O. Lugo (Docket No. 1549) sets forth the discounted hourly rate schedule to be applied by *ELS* for its representation of the Fee Examiner. Those disclosed rates are consistent with the rates disclosed on **Exhibit A** to this Application. As noted in the engagement letter of *ELS*, these discounted 2018 hourly rates remain in effect for the duration of *ELS*’s representation, absent a court-approved rate adjustment after notice and a hearing.

BACKGROUND

1. On May 3, 2017, the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 304 (a) of PROMESA, filed a petition with the Court under Title III of PROMESA. Thereafter, the Oversight Board commenced a Title III case for each of the Puerto Rico Sales Tax Financing Corporation (“COFINA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”) and the Puerto Rico Electric Power Authority (“PREPA”).

2. By orders dated June 29, 2017 (Docket No. 537) and October 6, 2017 (Docket No. 1417), the Court approved the joint administration of the Title III Cases.

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 6

3. The Court appointed the Fee Examiner on October 6, 2017 (Docket No. 1416) to execute the duties set forth in the Fee Examiner Order, including, among other things, monitoring the fees and expenses incurred by professionals in these Title III cases. The Fee Examiner Order approved the appointment of Brady C. Williamson as the Fee Examiner and Godfrey & Kahn as counsel to the Fee Examiner.

4. On December 13, 2017, the Court entered the *ELS Retention Order* as Local Counsel for the Fee Examiner.

5. *ELS* is a Puerto Rico based law firm. The professional background and qualifications of each *ELS* are set forth in detail in **Exhibit A**. The attorneys from *ELS* that have provided legal services on the underlying matter have been by Eyck O. Lugo and Ana Mary Rivera.

DESCRIPTION OF THE SERVICES PROVIDED

6. *ELS* assisted the Fee Examiner and its counsel with the review and filing of the reports and recommendations filed, including the current Interim Fee Period.

7. Additionally, *ELS* provided the Fee Examiner and its counsel with assistance in the following: (1) drafting of motions, notices and proposed orders; (2) review and filing of fee applications, reports, and other pleadings; (3) communication with professionals in connection to the Fee Examiner's position on extension of time to file fee applications and fee review process during the COVID-19 emergency; and (4) case administrative support. A detailed description of the specific services provided and the time expended performing such services are attached as **Exhibit E**.

8. As part of the services rendered, *ELS* remotely appeared in the following omnibus and fee hearings: April 22, 2020 and June 3, 2020.

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 7

9. The services for which compensation is requested appear divided in two (2) project categories: Matter 000044-0001: Promesa Title III Proceeding/Case No. 17-BK-3283 (LTS) and Matter 000044-0002: Fee Statement Preparation. Attached hereto as **Exhibit B** is a summary of the professional services provided by *ELS* during the Compensation Period.

10. For Matter 000044-0001, a total of 18.30 hours were required to carry out the work for a total of \$3,480.00. Services provided in this category include general case management activities as well as drafting, reviewing and filing of pleadings that bear directly on the reasonableness of fees as well as the position that the Fee Examiner has taken as to application for compensations and other matters. Preparation for, and remote appearance at hearings are also included under this category. Communications with the Fee Examiner and other counsel is also part of this category.

11. For Matter 000044-0002, a total of 17.10 hours were required to carry out the work for a total of \$3,420.00. Time spent in this category include the preparation of the First Interim and Consolidated Fee Application of *ELS*, Local Counsel to the Fee Examiner for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from February 2020 through August 2020 and supporting exhibits.

12. The foregoing professional services were necessary and appropriate to the administration of the Title III Cases and were incurred upon the in the best of the interest of all the parties.

REQUEST FOR APPROVAL OF COMPENSATION

13. Pursuant to PROMESA §§ 316 and 317, incorporating 11 U.S.C. 330 and 331, *ELS* moves this Court to enter Order of Approval providing for payment of all outstanding fees and expenses for services rendered during the Compensation Period since the work detailed herein

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 8

provided direct benefit to the estate by helping provide transparency and accountability in the professional fee process.

14. All of the Fee Examiner's standards and guidelines applied to other Professionals have also been applied to *ELS*.

15. The fees charged by *ELS* in the underlying case are billed in accordance with its existing billing rates and procedures and are consistent with the fee arrangements approved in the *ELS* Employment Order and have not changed since the commencement of this engagement. The rates for services provided are comparable to the rates *ELS* charges for professional services rendered in comparable non-bankruptcy matters and are based on customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in the Puerto Rico legal market.

16. *ELS* rates are set at a level designed to fairly compensate *ELS* for the work of its attorneys to cover fixed and routine overhead expense. *ELS* operates in the Puerto Rico legal market in which rates are driven by multiple factors relating to the individual lawyer, their area of specialization, the firm's expertise, performance and reputation, the nature of the work involved, and other factors. Accordingly, *ELS* set its rates for attorneys with the firm by reference to market information and market adjustments by firms considered to be industry peers. Based on this and the reviews of contemporaneous time records and fee applications filed in other cases, *ELS* endeavors to set the hourly rates for its attorneys at levels comparable to those of its principal competitor firms.

17. The detailed *ELS*'s time records accompanying **Exhibit E** are in the form of monthly statements used by *ELS* to bill its clients for services rendered, and include the date the services were rendered, a detailed, contemporaneous narrative description of the services provided,

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 9

the amount of time spent for each service, and the designation of the professional who performed the service.

18. There is no agreement between the *ELS* and any other entity for the sharing of compensation to be received.

19. *ELS* respectfully sustains that the services provided were actual and necessary to the administration of the fee examination process in the case and are reasonable in light of the nature, extent, and value of such services provided to the Fee Examiner. The requested compensation and reimbursement meet the statutory requirements for allowance.

20. Accordingly, approval of the requested compensation is warranted.

**REQUEST FOR REIMBURSEMENT OF ACTUAL AND NECESSARY EXPESE
INCURRED DURING THE COMPENSATION PERIOD**

21. As set forth in **Exhibit F** hereto, *ELS* incurred a total expense of \$76.10 in expenses from February 2020 through August 2020.

22. **Exhibit F** contains the expense categories for which *ELS* seeks reimbursement and the detailed expense record.

23. *ELS* certifies that no profit is being made on any expense incurred.

24. The expenses for which *ELS* seeks reimbursement include only those charges that are routinely charged to *ELS*'s clients. To wit, *ELS* charges all of its clients \$0.10 for each black and white copy and \$0.25 for each color copy. Court Solutions, LLC charges are also included in this category.

25. Theretofore, the expenses being claimed are actual, reasonable and necessary in light of the scope of the Applicant's retention to aid the Fee Examiner.

RESERVATION OF RIGHTS AND NOTICE

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 10

26. It is possible that some professional time expended or expenses incurred during the Compensation Period are not reflected in the Fee Application, *ELS* reserves the right to include such amounts in future fee applications. In addition, *ELS* has provided notice of this Application in accordance with the Amended Interim Compensation Order and Fed. R. Bankr. P. 2002(a)(6)

NO PRIOR REQUEST

No prior application for the relief requested herein has been made to this or any other Court.

WHEREFORE, *EDGE LEGAL STRATEGIES, P.S.C* respectfully request that the Court enter and order (a) awarding *EDGE LEGAL STRATEGIES, P.S.C.* interim compensation for professional services provided during the Compensation Period in the amount of \$6,900.00 and reimbursement of actual, reasonable, and necessary expenses incurred in the Compensation Period in the amount of \$76.10; (b) authorizing and directing Debtors to remit payment to *EDGE LEGAL STRATEGIES, P.S.C.* for such fees and expenses, within fourteen calendar days from the date of any order arising from this application; and (c) granting such other relief as is appropriate under the circumstances.

EDGE LEGAL STRATEGIES, P.S.C.
252 Ponce de León Ave, Suite 1200
San Juan, PR 00918
Tel. 787-522-2000; Fax 787-522-2010

s/ Eyck O. Lugo Rivera
Eyck O. Lugo Rivera
USDC-PR No.: 216708
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EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 11

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<hr/>)	PROMESA
In re)	Title III
)	
THE FINANCIAL OVERSIGHT AND)	No. 17 BK 3283-LTS
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	(Jointly Administered)
)	
As a representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO)	
<i>et al.</i>,)	
)	
Debtors.²)	
<hr/>)	

**CERTIFICATION OF EYCK O. LUGO, ESQ. PURSUANT TO PUERTO RICO LOCAL
BANKRUPTCY RULE 2016-1(a)(4)**

I, Eyck O. Lugo, under penalty of perjury, certifies as follows:

1. I am Senior Counsel in the law firm EDGE LEGAL STRATEGIES, P.S.C. (*ELS*).

I make this certification in accordance with Rule 2016-1(a)(4) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”) regarding the contents of applications for compensation and expenses.

² The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and, (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801 (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 12

2. I am familiar with the work performed by *ELS* for Brady Williamson, Esq., fee examiner.

3. I have read the *Second Interim Application of EDGE LEGAL STRATEGIES, P.S.C. as local counsel to Brady Williamson, Esq. Fee Examiner, for services rendered and reimbursement of expenses for the period of February 2020 to August 2020* (the “Application”) and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

4. To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought in the Application are permissible under PROMESA, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Interim Compensation order, the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013* (the “Guidelines”), and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico.

Dated: November 12, 2020

s/ Eyck O. Lugo

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 13

Exhibit A – List of Summary of Hours by Professional

<u>Name of ELS Professional</u>	<u>Title or Position</u>	<u>Practice Group, Year of Obtaining License to Practice</u>	<u>Hourly Billing Rate</u>	<u>Total Billed Hours</u>	<u>Total Compensation</u>
Eyck O. Lugo (EOL)	Counsel	Litigation/Bankruptcy, 1999 P.R., 2001 N.Y.	\$200.00	32.70	\$6,600.00
Ana Mary Rivera	Senior Associate	Litigation/Bankruptcy, 2017 P.R.	\$125.00	2.40	\$300.00

Total Fees Requested in this Application: \$ 6,900.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 14

Exhibit B – Summary of Hours and Compensation by Matter

Matter	Matter Description	<u>Total Billed Hours</u>	<u>Total Fees Requested</u>
000044-0001:	PROMESA Title III Proceeding/Case No. 17-BK- 3283 (LTS)	18.00	\$3,480.00
000044-0002:	Fee Statement Preparation	17.10	\$3,420.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 15

Exhibit C – Expense Summary

February 2020 through August 2020

Expense Category	Amount
Court Solutions LLC	\$70.00
Copies black and white	\$4.10
Color copies	\$2.00
Total	\$76.10

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 16

Exhibit D: List of Professionals By Matter

Matter	Matter Description	Total Billed Hours by Eyck O. Lugo (EOL)	Total Billed Hours by Ana Mary Rivera (<u>ARC</u>)	Total Fees requested by Eyck O. Lugo (EOL)	Total Fees Requested by <u>Ana Mary</u> <u>Rivera</u> (<u>ARC</u>)
000044- 0001:	PROMESA Title III Proceeding/Case No. 17-BK-3283 (LTS)	15.60	2.40	\$3,180.00	\$300.00
000044- 0002:	Fee Statement Preparation	17.10	-	\$3,420.00	-

EDGE LEGAL STRATEGIES, P.S.C.
 Second Interim and Consolidated Application
 P. 17

Exhibit E – Detailed Time Record

Matter 0001- PROMESA TITLE III PROCEEDING / CASE NO. 17-BK-3283 (LTS)

Date	Professional	Matter summary	Hours	Rate	Amount
02/05/20	ARC	Review communications from Mrs. Linda Schmidt regarding inquiry about attorney fees under PR regulations.	0.20	125.00	25.00
02/06/20	ARC	Work session with Atty. Eyck Lugo to discuss client's inquiry about attorney fee regulations under PR law	0.20	125.00	25.00
02/06/20	ARC	Review case law regarding attorney fee regulations under PR law.	2.00	125.00	250.00
02/26/20	EOL	Reviewed, analyzed and filed Report of Uncontested Fee Matters for March 4th Omnibus Hearing. Served courtesy copy and proposed order upon chambers.	1.00	200.00	200.00
03/27/20	EOL	Communicated with Atty. K. Stadler regarding extension of time to file fee applications in light of locally mandated curfew.	0.30	200.00	60.00
03/27/20	EOL	Communicated several times with local counsel for FOMB. Re: Extension of time to file fee applications in light of locally mandated curfew.	0.40	200.00	80.00
03/30/20	EOL	Reviewed, revised and commented upon draft of memorandum to professionals regarding fee review process during COVID-19 emergency.	0.50	200.00	100.00
04/15/20	EOL	Reviewed, revised and filed Fee Examiner's Supplemental Report on Uncontested Professional Fee Applications. Re: Upcoming 4/22 Omnibus Hearing.	1.20	200.00	240.00
04/15/20	EOL	Prepared and sent communication to presiding judge's Chambers and Master Service List serving courtesy copy of Fee Examiner's Supplemental Report on Uncontested Professional Fee Applications, together with draft proposed order.	0.50	200.00	100.00
04/15/20	EOL	Prepared and sent communication Prime Clerk. Re: Service of Fee Examiner's Supplemental Report on Uncontested Professional Fee Applications.	0.20	200.00	40.00
04/17/20	EOL	Reviewed, revised and filed Fee Examiner's Informative Motion Regarding Procedures for Upcoming 4/22 Omnibus Hearing.	0.50	200.00	100.00
04/17/20	EOL	Reviewed Interim Compensation Order entered by Court.	0.30	200.00	60.00
04/17/20	EOL	Prepared and submitted request for remote participation in 4/22 Omnibus Hearing.	0.30	200.00	60.00
04/20/20	EOL	Reviewed notice from court approving remote appearance request for 4/22 omnibus hearing.	0.20	200.00	40.00
04/21/20	EOL	Communicated with co-counsel from G&K, K. Stadler, regarding appearance at 4/22 omnibus hearing.	0.20	200.00	40.00
04/22/20	EOL	Communicated with Fee Examiner. Re: Outcome of 4/22 Omnibus Hearing.	0.30	200.00	60.00
04/22/20	EOL	Reviewed AAFAF's Summary on Puerto Rico's response to Covid-19 emergency.	0.50	200.00	100.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 18

05/01/20	EOL	Reviewed, revised and filed with Court Notice of Filing of Agreed Amended Omnibus Order. Re: Interim Compensation.	0.80	200.00	160.00
05/01/20	EOL	Communicated with Prime Clerk. Re: Service of Notice of Filing of Agreed Amended Omnibus Order. Re: Interim Compensation.	0.20	200.00	40.00
05/01/20	EOL	Prepared and sent to Chambers e-mail communication with courtesy copy of Notice of Filing of Agreed Amended Omnibus Order (Re: Interim Compensation), together with proposed order for study and consideration of court.	0.50	200.00	100.00
05/12/20	EOL	Performed final review and filed Fee Examiner's Fifth Fee Application and served corresponding courtesy copy and proposed order to Chambers and Master Service List.	1.00	200.00	200.00
05/12/20	EOL	Performed final review and filed Notice of Fee Examiner's Fifth Fee Application.	0.40	200.00	80.00
05/27/20	EOL	Performed final review of and filed Fee Examiner's Supplemental Report, including service of courtesy copy to presiding judge's chambers with proposed order.	1.30	200.00	260.00
05/29/20	EOL	Reviewed and analyzed draft Informative Motion regarding procedures for June 3rd Omnibus Hearing.	0.50	200.00	100.00
05/29/20	EOL	Completed registration process for June 3rd omnibus hearing.	0.10	200.00	20.00
06/03/20	EOL	Appeared telephonically at 6/3 Omnibus Hearing.	2.50	200.00	500.00
07/22/20	EOL	Performed final review and filed Fee Examiner's Report in Connection with July 29, 2020 Omnibus Hearing.	1.00	200.00	200.00
07/22/20	EOL	Served upon presiding Judge's chambers courtesy copy of Fee Examiner's Report in Connection with July 29, 2020 Omnibus Hearing, together with proposed order (and exhibits) for review and consideration of the court.	1.00	200.00	200.00
07/24/20	EOL	Reviewed interim compensation order entered by court, as per Fee Examiner's recommendation.	0.20	200.00	40.00

Total

18.30

3,480.00

MATTER 0002- FEE STATEMENT PREPARATION

Date	Professional	Matter summary	Hours	Rate	Amount
04/23/20	EOL	Worked on revised draft of first consolidated fee application.	1.30	200.00	260.00
05/07/20	EOL	Worked on draft of First Interim Fee Application.	5.00	200.00	1,000.00
05/08/20	EOL	Worked on draft of First Interim Fee Application.	5.00	200.00	1,000.00
05/14/20	EOL	Completed draft of First Consolidated Interim Fee Application for EDGE and forwarded same to co-counsel K. Stadler and G&K team for review and comments.	1.40	200.00	280.00
05/20/20	EOL	Reviewed and analyzed Fee Examiner's comments and proposed revisions to First Consolidated Interim Fee Application.	1.00	200.00	200.00
05/21/20	EOL	Performed additional review and revisions to draft first consolidated fee application.	2.00	200.00	400.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 19

05/31/20	EOL	Finalized and filed First Consolidated Fee Application for EDGE Legal Strategies, PSC, together with service of courtesy copies to Chambers and Master Service List.	1.00	200.00	200.00
06/22/20	EOL	Performed additional review and revisions to draft first consolidated fee application.	0.40	200.00	80.00

Total

17.10

\$ 3,420.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 20

Exhibit F: Detailed Expense Record

PROMESA TITLE III PROCEEDING / CASE NO. 17-BK-3283 (LTS)

Date	Expense Category	Amount
05/31/20	Copying - Black and White 0.10¢ - 38 black and white copies during May 2020.	\$ 3.80
05/31/20	Copying - Color 0.25¢ - 8 color copies during May 2020.	\$ 2.00
06/03/20	CourtSolutions LLC Transaction Fee In re Financial Oversight and Management Board of Puerto Rico. Case Number: 17-BK-3283. Judge: Laura Swain. Date and Time of Hearing: 6/3/2020 9:30 AM EST. (Paid with VISA Eyck O. Lugo, Esq.)	\$ 70.00
06/30/20	Copying - Black and White 0.10¢ - 3 black and white copies during the month of June 2020.	\$ 0.30

Total **\$ 76.10**

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 21

Exhibit G: Customary and Comparable Disclosures

EDGE LEGAL STRATEGIES, P.S.C.
Customary and Comparable Hourly Rate Disclosure
February 2020 through August 2020.

Category of Timekeeper	Billed for Years of Retention (2018-2019), Excluding Bankruptcy	Billed in this Fee Application
Shareholder	\$250.00-\$300.00	\$0.00
Counsel	\$250.00	\$200.00
Associate	\$150.00	\$125.00
Paralegal	\$75.00	\$0.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 22

Exhibit H: Budget and Staffing Plan

EDGE LEGAL STRATEGIES, P.S.C.
Budget and Staffing Plan
February 2020 through August 2020.

Matter	Project Category	Hours Budgeted	Fees Budgeted	Hours Billed	Fees Sought
0001	PROMESA Title III	126.5	\$22,990.11	18.30	3,480.00
0002	Fee Preparation	69	\$12,540.06	17.10	3,420.00

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 23

Exhibit I: Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<hr/>)	PROMESA
In re)	Title III
)	
THE FINANCIAL OVERSIGHT AND)	No. 17 BK 3283-LTS
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	(Jointly Administered)
)	
As a representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO)	
<i>et al.,</i>)	
)	
Debtors.³)	
<hr/>)	

**ORDER ALLOWING SECOND INTERIM AND CONSOLIDATED APPLICATION OF
EDGE LEGAL STRATEGIES, P.S.C., LOCAL COUNSEL FOR THE FEE EXAMINER**

This matter coming before the Court on the *Second Interim and Consolidated Application of EDGE LEGAL STRATEGIES, P.S.C., Counsel to the Fee Examiner, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from February 2020 through August 2020* [Dkt. No. ____] (the “**Application**”), pursuant to section 316 of the *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”), 48 U.S.C. §§ 2101-2241,

³ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and, (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801 (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 24

and Rule 2016 of the Federal Rules of Bankruptcy Procedure, for the interim allowance of certain fees and expenses, incurred by the applicants for the specific period of time set forth in the Application (the “**Compensation Period**”), filed in accordance with the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 3269] (the “**Interim Compensation Order**”), the *Eleventh Amended Notice, Case Management and Administrative Procedures* [Dkt. No. 11885-1] (the “**Case Management Procedures**”), the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing a Fee Examiner and Related Relief* [Dkt. No. 3324] (the “**Fee Examiner Order**”), and the *Order Authorizing the Employment of EDGE Legal Strategies, P.S.C. as Local Counsel to the Fee Examiner* [Dkt. No. 1992], and the Court having reviewed the Application; and the Court finding that:

- (a) the Court has jurisdiction over this matter pursuant to PROMESA section 306(a); and
- (b) notice of the Application and the hearing thereon was adequate under the circumstances; and,
- (c) all parties with notice of the Application have been afforded the opportunity to be heard on the Application, and no objections having been filed; now therefore

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED on an interim basis.
2. The applicants are allowed (a) \$6,900.00 in interim compensation for services rendered during the Compensation Period and (b) \$76.10 in interim reimbursement for actual and necessary expenses incurred during the Compensation Period.

EDGE LEGAL STRATEGIES, P.S.C.
Second Interim and Consolidated Application
P. 25

3. To the extent not already paid pursuant to the Interim Compensation Order, the Debtors are hereby authorized and directed to pay the applicant—within 15 days of the entry of this order—100 percent of the fees for services rendered and 100 percent of the expenses incurred during the Compensation Period.

Dated: December ____, 2020.

THE HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT COURT JUDGE